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July 7, 2023

VIA ECF:

The Honorable Catherine C. Blake
United States District Judge
United States District Court
for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

Re: *Andrews v. Baltimore Police Department, et al.*,
Civil Action No. 16-cv-2010-CCB

Dear Judge Blake:

We write to provide the Court with an updated Joint Status Report in the above-referenced matter.

As we noted in our prior letter, the Parties are still determining whether there are additional documents that need to be produced. In addition, Plaintiff continues to request certain documents from L3 Harris including, among others, the user's manual for the cell-site simulator at issue in the case. The user's manual is important as it deals directly with some of the issues raised by the Fourth Circuit. Counsel for the Plaintiff has met and conferred with counsel for L3 Harris about these documents but have been unable to obtain them. To the extent counsel is not provided with these materials, they may seek the Court's involvement in the matter via motion.

Counsel jointly requests the Court enter an Order requesting an updated Status Report by August 7, 2023. Should the Court have any questions or concerns, the Parties will make themselves available at the Court's convenience.

Respectfully yours,

/s/ George S. Mahaffey Jr.

George S. Mahaffey Jr.
Michael Pichini

cc: Counsel of Record (via ECF)